UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA Miami Division

Case No.: 1:25-cv-23232-DPG

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

DOW JONES & COMPANY, INC. d/b/a THE WALL STREET JOURNAL, a Delaware corporation, NEWS CORPORATION, a Delaware corporation, KEITH RUPERT MURDOCH, an individual, ROBERT THOMSON, an individual, KHADEEJA SAFDAR, an individual, and JOSEPH PALAZZOLO, an individual,

Defendants.

PLAINTIFF'S UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE HEARING ON OCTOBER 31, 2025

Plaintiff President Donald J. Trump ("Plaintiff" or "President Trump"), by and through his undersigned counsel, hereby files this Unopposed Motion to Continue the Status Conference hearing on October 31, 2025. In support, Plaintiff states as follows:

- 1. On October 3, 2025, the Court entered its Paperless Order setting a Status Conference hearing for October 31, 2025 at 1:00 p.m. [ECF No. 42].
- 2. Plaintiff's counsel was under the impression that the Status Conference had been scheduled for October 30, 2025 at 1:00 p.m.
- 3. However, upon reviewing the Court's docket, Plaintiff's counsel realized that the hearing is actually set for October 31, 2025 at 1:00 p.m.
- 4. Plaintiff's counsel has a prepaid flight on October 31, 2025 at 1:30 p.m. to be out of the state that day.

5. Accordingly, Plaintiff respectfully requests that the Court reschedule the Status

Conference to a later date convenient to the Court and all parties.

WHEREFORE, Plaintiff President Donald J. Trump respectfully requests that the Court

enter an Order continuing the hearing on the Status Conference at a later date and time. A proposed

order granting this unopposed Motion is attached hereto as **Exhibit A.**

CERTIFICATE OF CONFERENCE WITH LOCAL COUNSEL

Pursuant to S.D. Fla. L. R. 7.1(a)(3), counsel for Plaintiff certifies that he conferred with

counsel for Defendants Dow Jones & Company, Inc. d/b/a The Wall Street Journal, News

Corporation, Keith Rupert Murdoch, Robert Thomson, Khadeeja Safdar, and Joseph Palazzolo

("Defendants") via email on October 29, 2025. Defendants confirmed that they do not oppose the

relief sought in this Motion.

Date: October 29, 2025

Respectfully submitted,

BRITO, PLLC

Counsel for Plaintiff

2121 Ponce de Leon Boulevard

Suite 650

Coral Gables, FL 33134

Office: 305-614-4071

Fax: 305-440-4385

By: /s/ *Alejandro Brito*

ALEJANDRO BRITO

Florida Bar No. 098442

Primary: abrito@britopllc.com

Secondary: apiriou@britopllc.com

IAN MICHAEL CORP

Florida Bar No. 1010943

Primary: icorp@britopllc.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed on this 29th

day of October 2025 through the Florida Courts E-filing Portal upon:

George S. Lemieux, Esq.
Timothy J. McGinn, Esq.
Eric C. Edison, Esq.
Gunster, Yoakley & Stewart, P.A.
450 E. Las Olas Blvd., Suite 1400
Fort Lauderdale, FL 33301
glemieux@gunster.com
tmcginn@gunster.com
eedison@gunster.com
dpeterson@gunster.com
pholness@gunster.com
mzayas@gunster.com
eservice@gunster.com

Katherine M. Bolger, Esq.
Davis Wright Tremaine, LLP
1251 Avenue of the Americas
21st Floor
New York, New York 10020- 1104
katebolger@dwt.com
nycdocket@dwt.com

Meenakshi Krishnan, Esq Davis Wright Tremaine, LLP 1301 K Street NW Suite 500 East Washington, D.C. 20005 meenakshikrishnan@dwt.com amandalevine@dwt.com nycdocket@dwt.com

Amanda B. Levine, Esq.
Davis Wright Tremaine, LLP
1251 Avenue of the Americas
21st Floor
New York, New York 10020-1104
amandalevine@dwt.com

Steven A. Engel, Esq.
Dechert LLP
Three Bryant Park
1095 Avenue of the Americas
New York, New York 10036-6797
steven.engel@dechert.com
nycmanagingclerks@dechert.com

Andrew J. Levander, Esq.
Dechert LLP
Three Bryant Park
1095 Avenue of the Americas
New York, New York 10036-6797
andrew.levander@dechert.com
nycmanagingclerks@dechert.com

Counsel for Defendants

By: /s/ Alejandro Brito